

Bruce G. Chapman (State Bar No. 164258)
bchapman@cblh.com
Keith D. Fraser (State Bar No. 216279)
kfraser@cblh.com
CONNOLLY BOVE LODGE & HUTZ LLP
333 S. Grand Avenue, Suite 2300
Los Angeles, CA 90071
Telephone: (213) 787-2500; Facsimile: (213) 687-0498

Dianne B. Elderkin (admitted *pro hac vice*)
delderkin@akingump.com
Barbara L. Mullin (admitted *pro hac vice*)
bmullin@akingump.com
Steven D. Maslowski (admitted *pro hac vice*)
smaslowski@akingump.com
Angela Verrecchio (admitted *pro hac vice*)
averrecchio@akingump.com
Matthew A. Pearson (admitted *pro hac vice*)
mpearson@akingump.com
Rubén H. Muñoz (admitted *pro hac vice*)
rmunoz@akingump.com

AKIN GUMP STRAUSS HAUER & FELD LLP
Two Commerce Square, Suite 4100
2001 Market Street
Philadelphia, Pennsylvania 19103-7013
Telephone: (215) 965-1200; Facsimile: (215) 965-1210

Attorneys for Plaintiff and Counter-Defendant CENTOCOR ORTHO BIOTECH, INC. and Third-Party Defendants GLOBAL PHARMACEUTICAL SUPPLY GROUP, LLC, CENTOCOR BIOLOGICS, LLC and JOM PHARMACEUTICAL SERVICES, INC.

IN THE UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

CENTOCOR ORTHO BIOTECH,
INC.,

Plaintiff,

v.

GENENTECH, INC. and CITY OF
HOPE,

Defendants.

AND RELATED COUNTER AND
THIRD-PARTY ACTIONS.

Case No. CV 08-03573 MRP (JEMx)

**CENTOCOR ORTHO BIOTECH,
INC. AND ITS COUNTER-
DEFENDANT AFFILIATES'
APPLICATION TO FILE UNDER
SEAL:**

**MOTION FOR CONSTRUCTION
OF CLAIM TERM
"IMMUNOGLOBULIN" (MOTION
NO. 2)**

Date: August 17, 2010

Time: TBA

Place: Hon. Mariana Pfazler,
Courtroom 12

2010 JUL 13 PM 12:52
CLERK, U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

FILED

Pursuant to Local Rule 79-5.1, Plaintiff Centocor Ortho Biotech, Inc. ("Centocor") and its Cross-Defendant Affiliates seek leave to file the following documents under seal:

1. Memorandum in Support of Centocor Ortho BioTech, Inc. and its Cross Defendant Affiliates' Motion For Construction of Claim Term "Immunoglobulin" (Motion No. 2) ("Memorandum").

The document to be filed under seal contains or reflects confidential business information that is subject to confidentiality provisions. Specifically, the Memorandum cites to and discusses various supporting exhibits, including Exhibits 22, 23, and 24, which contain confidential details regarding Genentech's pharmaceutical research and development. These exhibits, cited and referenced in the Memorandum, have been designated as Confidential pursuant to the terms of the Protective Order.

Also, balancing the potential harm to Centocor, Genentech and third parties if the sensitive business information is released into the public with the relatively low public harm for nondisclosure of this information favors prohibiting disclosure.

For the foregoing reasons, Centocor respectfully requests that the Court grant this Application and order the aforementioned document be filed under seal.

Dated: July 12, 2010

Respectfully submitted,

CONNOLLY BOVE LODGE & HUTZ LLP

By: Keith D. Fraser

Keith D. Fraser

Attorneys for Plaintiff CENTOCOR ORTHO BIOTECH, INC. and Third-Party Defendants GLOBAL PHARMACUETICAL SUPPLY GROUP, LLC, CENTOCOR BIOLOGICS, LLC and JOM PHARMACEUTICAL SERVICES, INC. LLC and JOM PHARMACUETICAL SERVICES, INC.